

REMARKS/ARGUMENTS

Claims 33 and 34 have been cancelled without disclaimer or prejudice. New claims 35 and 36 have been added. Thus, claims 1-32 and 35-36 are now pending.

In the Office Action, the Examiner withdrew the rejection of claims under 35 U.S.C. §102. However, the Examiner has rejected the claims under 35 U.S.C. §103 on new grounds. This rejection is fully traversed below.

Patentability of Claims over *Hirsch and Kobayashi et al.*

The application relates to techniques for controlling access to data stored in records of a database. As such, as a method for controlling access to records stored in a database, claim 1 recites (a) defining at least one expression associated with at least one record of the database, (b) evaluating the at least one expression for the at least one record, and (c) allowing access to the at least one record based on the evaluation of the at least one expression.

In the Office Action, the Examiner rejected claims 1-10 and 28-31 under 35 U.S.C. §103(a) as being unpatentable over the U.S. Patent No. 6,263,339 B1 (*Hirsch*) in view of the U.S. Patent No. 6,275,825 B1 (*Kobayashi et al.*).

To support this rejection, the Examiner has asserted that *Hirsch* teaches defining at least one expression associated with at least one record of a database. *Hirsch* pertains to dynamic object visualization and code generation in the context of an editor for visually editing data. It is noted that the implementation of the editor includes an attribute window that is used to edit properties associated with a computer-implemented object. (*Hirsch*, Col. 2, lines 25-28). It is further noted that each of the attributes can be defined as a “functional expression.” (*Hirsch*, Col. 2, lines 34-41). Fig. 2 of *Hirsch* illustrates an object inspector (30) with several properties 112, 114, 116, 118, 120, 122, 124 and 126. Most of these properties are static (for example, size = 10). However, properties 112 (Text) and 122 (color) are dynamic and can be determined at runtime.

It is noted that these dynamic properties may be defined as a “functional expression” (If (Empld=100, Red, Black)). However, it is respectfully submitted that *Hirsch* does not teach defining at least one expression associated with at least one record of a database. This should be evident because *Hirsch* does not teach or suggest defining an expression for a record in a database. Instead, *Hirsch* teaches that

properties of a property editor can be functionally expressed and evaluated dynamically at runtime. Accordingly, it is respectfully submitted that the rejection of claims 1-10 and 28-31 under 35 U.S.C. §103(a) is improper and should be withdrawn.

Furthermore, it should be noted that *Hirsch* does not pertain to a database program. As such, *Hirsch* cannot be combined with *Kobayashi et al* to teach the claimed invention. In any case, the Examiner has admitted that *Hirsch* does not teach allowing access to at least one record in a database based on evaluation of an expression defined for that record. (Office Action, page 4). However, the Examiner proposes to use *Kobayashi et al.* in to order to overcome the grave deficiencies of *Hirsch*. Initially, it is respectfully submitted that *Kobayashi* cannot possibly overcome the deficiencies of *Hirsch*. Accordingly, it is respectfully submitted that Examiner has not made a prima facie case of obvious.

Moreover, it is respectfully submitted that *Kobayashi et al.* does not teach allowing access to at least one record in a database based on evaluating an expression that is defined for the record. *Kobayashi et al.* pertains to a data access control arranged to automatically set access right information limiting data access in accordance to a user attribute when a user accesses a database (*Kobayashi et al.*, Abstract). It should be noted that data access (access right) is determined based on a user profile (or user login). As such, *Kobayashi et al.* does not teach determining access to a record based on an expression that is defined for that record. In fact, *Kobayashi et al.* teaches away from determining access for a record based on an expression defined for that record because it proposes to use a user attribute to define access rights. Accordingly, it is respectfully submitted that the rejection of claims 1-10 and 28-31 under 35 U.S.C. §103(a) is improper for these additional reasons and should be withdrawn.

Furthermore, it is respectfully submitted that claim 1 is patentable over for the cited art for at least the reasons discussed above. In addition, claims that are dependent on claim 1 are patentable at least for these reasons. Moreover, these dependent claims recite additional features that render them patentable for additional reasons. In addition, it should be noted that although claim 28 is directed to a computer readable media, it recites similar features as those discussed above with respect to claim 1. Accordingly, it is respectfully submitted that claim 28 and its dependent claims are also patentable for similar reasons. Still furthermore, it is respectfully submitted that claim 11 and its dependent claims are patentable because claim 11, among other things,

recites defining a calculation expression and evaluating the calculation expression in context of a controlling access to records stored in a database.

Patentability of Claims over *Leong* and *Couch et al.*

In the Office Action, the Examiner rejected claims 16-27 under 35 U.S.C. §103(a) as being unpatentable over the U.S. Patent No. 6,434,552 B1 (*Leong*) in view of the U.S. Patent No. 6,493,700 B2 (*Couch et al.*).

Initially, it is respectfully that Examiner has not addressed the features of a database program including a Graphical User Interface that can be used to facilitate operations on one or more records stored in a database. Claim 16, among other things, recites this feature. As such, the rejection of 16-27 is improper and should be withdrawn.

Furthermore, as noted by the Examiner, *Leong* does not teach a Graphical User Interface operating to facilitate defining access privileges with respect to one or more records stored in a database. (Office Action, page 12). Instead, it teaches a method of retrieving data using a search command. (*Leong*, Col 10, lines 50-65). As shown in Fig. 2 of *Leong*, various search application programs 200, 202, 204 and 206 can search a databases 214, 216 and 218 via a database management system (DBMS) 224. Accordingly, it is respectfully submitted that *Couch et al.* cannot possibly overcome the serious deficiencies of *Leong*. Therefore, it is respectfully submitted that the Examiner has not made a prima facie case of obvious.

Moreover, contrary to the Examiner's assertion, *Couch et al.* does not teach a Graphical User Interface operating to facilitate defining access privileges with respect to one or more records stored in a database. *Couch et al.* pertains to specifying custom qualifiers for explain tables. (*Couch et al.*, Abstract). It should be noted that *Couch et al.* states that an explain table qualifier designation module 100 allows a user to designate any explain table 51 that the user wishes to reference, so long as the user has the required privileges. (*Couch et al.*, Col. 9, lines 52-65). Hence, *Couch et al.* does not teach defining access privileges with respect to one or more records stored in a database. Instead, it teaches controlling access based on user privileges and not based on an expression defined for a record. In fact, the methodology of *Couch et al.* teaches away from defining access privileges with respect to one or more records stored in a database because it teaches controlling access based on user privilege. Accordingly, it is respectfully submitted that the rejection of claims 16-27 under 35

U.S.C. §103(a) is improper for these additional reasons and should be withdrawn. In addition, it should also be noted that *Couch et al.* describes operations associated with an explain table and not a record of a database. As such, it is earnestly believed that the rejection is improper for yet additional reasons.

Claim 16, among other things, recites that the Graphical User Interface operates to facilitate defining access privileges with respect to one or more records stored in the database. Thus, it is respectfully submitted that claim 16 and its dependent claims are patentable over the cited art for at least this reason alone. In addition, claims that are dependent on claim 16 are patentable. Moreover, these claims additional features that render them patentable over the cited art for additional reasons. For example, claim 17 recites that the Graphical User Interface operates to provide the ability for a user of said database to define an expression associated with at least one operation that may be requested to be performed by another user of the database on the one or more records stored in said database. It is respectfully submitted that *Couch et al.* cannot possibly teach this feature.

Summary

Based on the foregoing, it is submitted that all pending claims are patentably distinct over the cited art of record. Additional limitations recited in the independent claims or the dependent claims are not further discussed as the limitations discussed above are sufficient to distinguish the claimed invention from the cited art. Accordingly, it is respectfully requested that the Examiner withdraw all the rejections to the claims.

Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

No fees are believed to be due; however, if fees are found to be due, please charge any fees or credits, or any extensions of time, to Deposit Account No. 500338 (Order No. CLARP027/P2616).

Respectfully submitted,
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